## Requirements for Providing Service: A comparison of Video Relay Service and Video Remote Interpreting Hands On Video Relay Services, Inc.

## **Definition of terms:**

**Video Relay Service (VRS):** A public, on-demand telecommunication service regulated under the FCC's TRS program that provides Deaf and Hard of Hearing persons with access to communication over standard phone lines.

**Video Remote Interpreting (VRI):** A fee-for-service form of interpreting which allows consumers to schedule interpreters via a point-to-point videoconference instead of having a live, on-site interpreter.

Requirement	VRS	VRI	Comment
All FCC references pertain to 1	FCC TRS	Rules 4	7 U.S.C. § 225 Docket 98-67
DS 3 Internet Connections	Yes	No	VRS required to accommodate many
			simultaneous calls. VRI can operate on
			one ISDN or T-1, or high-speed access
47 C.F.R. § 64.604(b)(2)			line.
Local Area Network Required	Yes	No	All VRS stations are connected to the
47 C.F.R. § 64.604(b)(2)			network to handle multiple calls.
Redundant Networks	Yes	No	Per FCC TRS regulations, service must
			be provided even in the event of
47 C.F.R. § 64.604(b)(4)			emergencies or disasters.
Firewall Technology	Yes	No	VRI is "point-to-point." VRS must deal
			with firewall issues on the customers'
			end. VRS must guarantee the
			confidentiality of calls, requiring heavy-
47 C.F.R. § 64.604(a)(2)(i)			duty firewall protection.
Network Engineer	Yes	Limited	VRS requires high-level engineers for
			integration with Telecom's platforms and
			guaranteed service despite emergencies
47 C.F.D. 0 (4 (04( )/2)/;)			or disasters. VRI can operate with
47 C.F.R. § 64.604(a)(2)(i)	***	N.T.	technician-level personnel.
<b>Extensive Hardware Investment</b>	Yes	No	VRS must accommodate multiple call
47 C.F.D. 0 (4 (04/1)/0)			volume. VRI can initiate service with
47 C.F.R. § 64.604(b)(2)	37	NT.	one workstation.
Emergency Power Requirements	Yes	No	Per FCC TRS Regulations.
47 C.F.R. § 64.604(b)(4)	***	N.T.	O d D DOMG I
Telephone Network	Yes	No	Outbound calls are made on POTS lines.
			Also, Voice Initiated Calls are received
			by phone. Note that currently,
			technology does not exist for providing
			voice initiated calls via VRS, and must be
47 C E D 8 64 602			developed to comply with TRS
47 C.F.R. § 64.603			regulations.

VRS Platform/Database	Yes	No	Daguired of VDS by Talagama for
VKS Flatform/Database	res	INO	Required of VRS by Telecoms for reporting purposes.
47 C.F.R. § 64.604(c)(5)(ii)			reporting purposes.
47 C.F.R. § 64.604(c)(5)(iii)(C)			
47 C.F.R. § 64.604(c)(5)(iii)(E)			
47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	VDC must accommodate all callers
Video Codec Research and Development	res	No	VRS must accommodate all callers,
47 C E D 8 64 604(a)(5)			despite low bandwidth. NetMeeting is
47 C.F.R. § 64.604(c)(5)  Customized Software	Yes	No	not satisfactory to users.  VRI = off-the-shelf programs. FCC
	1 68	INO	requires complex reporting and data
47 C.F.R. § 64.604(c)(5)(ii)			1 1 5
47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E)			capture.
47 C.F.R. § 64.604(c)(5)(iii)(H)  Software Engineers	Yes	No	See Network Engineer comments.
Extensive Software Investment	Yes	No	VRS must accommodate call volume.
Extensive Software Investment	1 03	110	VRI can use off-the-shelf components,
			and initiate service with one workstation,
			thus requiring fewer software licenses,
47 C.F.R. § 64.604(b)(2)			etc.
Limited Equipment Cost	No	Yes	VRI requires a simple "point-to-point"
Limited Equipment Cost	INU	1 05	video program. VRI can elect to limit
			provision of service. VRS must accept
			calls from any point of origination,
			including ISDN or IP lines, Mac or PC
			computers, videophones, or set-top
			videoconferencing devices.
Secure Call Center	Yes	No	Per FCC TRS Regulations, service must
Secure can center	105	110	be provided from a secure location.
Call Center Management	Yes	No	Per FCC TRS Regulations. Secured call
8			center requires Management for daily
47 C.F.R. § 64.604(c)(5)(iii)(H)			operations.
Full-time Trainer(s)	Yes	No	Per FCC TRS Regulations, VRS must
, ,			offer standardized service, functionally
47 C.F.R. § 64.604(a)(1)			equivalent to a phone call. This requires
47 C.F.R. § 64.604(a)(2)(ii)		<u></u>	training.
Standardized Policies and Procedures	Yes	No	Per FCC TRS Regulations, VRS must
			offer standardized service, functionally
47 C.F.R. § 64.604(a)(3)			equivalent to a phone call.
<b>Customer Service Organization and</b>	Yes	No	VRI is not regulated. Telecoms require
Database			customer service function from VRS.
47 C.F.R. § 64.604(c)(1)(i)			
47 C.F.R. § 64.604(c)(1)(ii)			
47 C.F.R. § 64.604(c)(2)(i)			
47 C.F.R. § 64.604(c)(2)(ii)			

Marketing/Outreach Personnel  47 C.F.R. § 64.604(c)(3)	Yes	Limited	FCC requires TRS providers to conduct Marketing and Outreach programs via Internet, television, publications, conferences, and media that targets the Deaf and Hard of Hearing population. Further, FCC requires that TRS providers offer training for use of services.
Quality Control/Quality Assurance Department  47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii)	Yes	No	Per FCC TRS Regulations. VRS is required to file customer comments with the FCC.
Comprehensive support staff  47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii) 47 C.F.R. § 64.604(c)(2)(i) 47 C.F.R. § 64.604(c)(2)(ii)	Yes	No	VRI does not have the same complex scheduling/forecasting, billing, technical support, compliance, or customer service demands that VRS does.
<b>24 Hour Operation, 365 Days/Year</b> 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS Regulations.
Scheduled Services/Managed Volume	No	Yes	FCC requires that VRS accommodate call demand. Providers have no control over call volume. VRS will never achieve the occupancy rates of other types of TRS, due to the physical/mental demands of sustained interpreting and inability to recruit qualified candidates if work demands deviate far from Interpreter Industry standards (see Registry of Interpreters for the Deaf Standard Practice Paper at <a href="https://www.rid.org/115.pdf">www.rid.org/115.pdf</a> ).  VRI can schedule and limit service provided. Typically, VRI requires 24 – 48 hour advance notice or higher rates are charged. Often a minimum number
47 C.F.R. § 64.604(b)(2)			of minutes must be purchased for each session. If session is cancelled with less than 24 hours notice, customer is still billed.

<b>Coverage for Potentially Unlimited Volume</b>	Yes	No	VRS is required to forecast and provide coverage for call volume.
47 C.F.R. § 64.604(b)(2)			
47 C.F.R. § 64.604(b)(4)			
47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS Regulations, must have sufficient staff to provide less than 10 second wait time for 85% of calls received. Failure to comply results in \$1000/day imposed fines.
Complex Reporting and Billing	Yes	No	FCC requires extensive reporting features.
47 C.F.R. § 64.604(c)(5)(ii)			
47 C.F.R. § 64.604(c)(5)(iii)(C)			
47 C.F.R. § 64.604(c)(5)(iii)(E)			
47 C.F.R. § 64.604(c)(5)(iii)(H)	17	NT.	D ECCADOD 14: ADI:
Certified/Qualified Interpreters  47 C.F.R. § 64.604(a)	Yes	No	Per FCC VRS Regulations. VRI is not regulated. This is desirable but not required for VRI.
Discrimination in Accepting Interpreting	No	Yes	VRI allows for discrimination in
Assignments	110		acceptance of interpreting assignments and placement according to skill level. VRS interpreters must ALL have a level of competence to handle any call that is received with no advance notice of the subject matter or signing styles involved. This requires many years of experience to acquire the depth of skill necessary, which translates into higher costs for such skills, and higher costs for
47 C.F.R. § 64.604(a)(1)	***	3.7	recruitment.
Personnel/Legal Consultation for	Yes	No	VRS requires working with the FCC,
Compliance with FCC Regulations	V	NT.	incurring legal costs and expenses.
Contract Negotiations	Yes	No	VRS providers must either contract with entities authorized to bill the TRS fund or obtain or contract with certified state
47 C.F.R. § 64.604(f)(2)			programs, either one creating additional administrative costs.